

Ms. Bean,

In the interest of permitting the best irrigation methods for California Native plants, please consider innovative, low precipitation rate, overhead irrigation nozzles such as the MP Rotator for inclusion in the category of "micro-spray" systems. My own experience with drip irrigation in all but sandy soil conditions concurs with other observations and writing, most notable by Burt Willson of [Las Pilitas Nursery](#) a leader in the field that California Native plants, except wetland species, generally do not like point-source irrigation such as drip.

Also - the Rulemaking Package, I believe, will have a negative impact on the use of innovative irrigation technology unless the criteria for compliance is clarified to set limits on precipitation rate rather than nozzle output. As currently written, and using the interpretation of the Irrigation Association as to what falls under their definition of a "Micro-Spray" nozzle, some nozzles within the same family of matched-precipitation rate devices will not qualify (a 360 degree nozzle vs a 180 degree nozzle). A rule based upon precipitation rate is logically defensible, though admittedly more difficult to mandate and administer.

I'll suggest a solution to the "nozzle vs. precipitation rate" dilemma: That landscapes which include ONLY "low, or very low, water-use plants, as classified by the State of California through it's WUCOLS program, be exempted from the nozzle rule. The State "Model Water Efficient Landscape Ordinance" is already being administered by local municipalities. These localities can become the administrators of such a rule.

Thank you for your consideration,

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